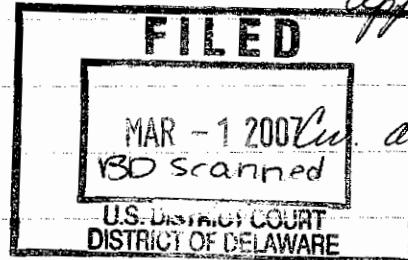


In the United States District Court  
For the District of Delaware

James S. Lewis  
plaintiff

v  
Morris et al

Motion for  
Appointment of  
Counsel



236

Pursuant to 28 U.S.C. § 1915 (e) (1)  
plaintiff moves for an order appointing  
counsel to represent him in the case at hand.

In support of this motion plaintiff states:

1. Plaintiff is unable to afford counsel.  
He has requested leave to proceed in forma  
paupers and was granted.

2. Counsel can explain the applicable  
legal principles to the plaintiff and limit  
litigation to potentially meritorious issues.

In addition appointment of a lawyer provides  
the unlettered inmate with the opportunity  
to obtain representation equally qualified  
with the professional counsel usually  
provided by the state for the defendants.

3. Plaintiff imprisonment has greatly  
limited his ability to litigate and investigate.  
The issues of this case are very complex  
and involve Constitutional issues denied him

Plaintiff has a limited access to the law library and limited knowledge of the law.

4. Because of inmates having been transferred to other prisons and/or released plaintiff's ability to present his case has been greatly diminished.

5. For reasons of discovery and other inmates testimony plaintiff is greatly deprived without assistance of counsel.

6. With ability to question other guards within and transferred to other facilities plaintiff is greatly deprived without assistance of counsel.

7. Plaintiff lacks ability to present his case in a manner befitting this Court, in a precise and clear legal manner.

Wherefore, plaintiff request that the Court appoint a member of the bar as counsel to represent plaintiff in this case so that the planks of justice will be equal between plaintiff and defendants.

James St. James

5B1 446518

1181 Paddock Rd.

Smyrna Delaware.

Certificate of Service

I hereby certify that on February 28, 2007  
I mailed a motion for appointment of  
Counsel with the clerk of this court. I  
also certify that on February 28 2007 I  
mailed by United States Service a copy of  
the same document to the following  
participant.

Deputy Attorney General  
Department of Justice  
820 N. French St.  
Wilmington De 19801

James S. Lewis  
AB# 446518  
Delaware Correction  
1181 Paddock Rd.  
Smyrna, De  
19977

IM James A. Jacobs  
SBI# 446518 UNIT Belle-E (E-17)  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977

SBH# 446515 UNIT Delta - E (E-17)  
I/M James G. Jagger

**DELAWARE CORRECTIONAL CENTER**  
**11181 DADDY GOOLY RD.**

SMYRNA, DELAWARE 19977

WILMINGTON DE 197  
28 FEB 2007 PM 21

卷之三

Office of the Clerk  
United States District Court  
Lockbox 18  
844 King Street  
Wilmington, NC 28401  
1980/

卷之三